DECISION
AND
FINDING OF NO SIGNIFICANT IMPACT
FOR
DEER DAMAGE MANAGEMENT
IN THE COMMONWEALTH OF VIRGINIA

The U.S. Department of Agriculture, Animal and Plant Health Inspection Service (USDA-APHIS), Wildlife Services (WS) program responds to requests for assistance from individuals, organizations and agencies experiencing damage caused by wildlife. Ordinarily, according to APHIS procedures implementing the National Environmental Policy Act (NEPA), individual wildlife damage management actions may be categorically excluded (7 CFR 372.5(c), 60 Fed. Reg. 6000-6003, 1995). To evaluate and determine if any potentially significant impacts to the human environment from WS' planned and proposed program would occur, an environmental assessment (EA) was prepared. The EA documents the need for deer damage management in the Commonwealth of Virginia and assessed potential impacts of alternatives for responding to damage problems. WS' proposed action is to continue the current deer damage management program on all land classes in Virginia. WS would provide technical assistance and would lethally remove deer to alleviate damage to agriculture, property, natural resources, and human health and safety. Comments from the public involvement process were reviewed for substantial issues and alternatives which were considered in developing this decision.

The EA analyzes the potential environmental and social effects for resolving deer damage related to the protection of agricultural and natural resources, property, and threats to public health and safety on private and public lands in Virginia. Virginia encompasses about 26,090,880 acres; during Fiscal Year (FY) 98, WS had 6 *Agreements for Control* to conduct deer damage management on a total of 19,709 acres or less than 0.08% of the land area of Virginia (Management Information System (MIS) 1998). In FY 99, Virginia WS conducted damage management projects for deer damage management (respectively) on properties covering an area of about 16,800 acres or about 0.064% of the land area of Virginia (MIS 1999).

WS is the Federal program authorized by law to reduce damage caused by wildlife (Animal Damage Control Act of March 2, 1931, as amended (46 Stat. 1486; 7 U.S.C. 426-426c) and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public Law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 U.S.C. 426c). Wildlife damage management is the alleviation of damage or other problems caused by or related to the presence of wildlife, and is recognized as an integral part of wildlife management (The Wildlife Society 1992). WS uses an Integrated Wildlife Damage Management (IWDM) approach, commonly known as Integrated Pest Management (WS Directive 2.105) in which a combination of methods may be used or recommended to reduce damage. WS wildlife damage management is not based on punishing offending animals but as one means of reducing damage and is used as part of the WS Decision Model (Slate et al. 1992, USDA 1997, WS Directive 2.201). The imminent threat of damage or loss of resources is often deemed sufficient for wildlife damage management actions to be initiated (U.S. District Court of Utah 1993). Resource management agencies and resource owners have requested WS to conduct deer damage management to protect agricultural and natural resources, property, and human health and safety in Virginia. All Virginia WS wildlife damage management is in compliance with relevant laws, regulations, policies, orders and procedures, including the Endangered Species Act of 1973 and Clean Water Act.

Virginia WS works and consults with the Virginia Department of Game and Inland Fisheries (VDGIF) to reduce wildlife damage. The VDGIF has the responsibility to manage all wildlife in Virginia, including federally listed T&E species and migratory birds, which is a joint responsibility with the US Fish and Wildlife Service (USFWS). Memoranda of Understanding (MOUs) signed between APHIS-WS and the VDGIF clearly outline the responsibility, technical expertise and coordination between agencies. The VDGIF worked with Virginia WS to determine whether the proposed action is in compliance with relevant management plans, laws, regulations, policies, orders, and procedures.

Consistency

Wildlife damage management conducted in Virginia will be consistent with MOUs and policies of APHIS-WS and the VDGIF and the EA. VDGIF may, at times, restrict damage management that concerns public safety or resource values.

The analyses in the EA demonstrate that Alternative 1: 1) best addresses the issues identified in the EA, 2) provides safeguards for public health and safety, 3) provides WS the best opportunity to reduce damage while providing low impacts on non-target species, 4) balances the economic effects to agricultural and natural resources, and property, and 5) allows WS to meet its obligations to the VDGIF and other agencies or entities.

Monitoring

The Virginia WS program will annually provide to the VDGIF the WS take of target and non-target animals to help insure the total statewide take (WS and other take) does not impact the viability of deer populations as determined by the VDGIF. In addition, the EA will be reviewed each year to ensure that it and the analysis are sufficient.

The authority for management of resident wildlife species in Virginia is the responsibility of the VDGIF. VDGIF compiles and provided information on population trends and harvest, and uses this information to manage deer populations. VDGIF estimates that the current pre-hunt deer population is fairly stable at approximately 950,000-1,000,000 animals (VDGIF 1999).

Table 1. Deer Harvest Data for Virginia (MIS 1997, 1998, 1999,VDGIF 1999).

Deer Harvest Data	1997	1998	1999
WS Kill	4	27	88
# Taken During State Regulated Harvest Season	198,561	179,027	189,572
# Taken under VDGIF Kill Permits	5,665	5,474	5,558
Total Deer Take	204,230	184,528	195,218
%WS Take (% of total take)	<.01	.01	.04

Cumulatively, the total kill of deer during 1999 from the regulated harvest season, WS damage management activities, and under Kill Permits was 195,218 which is only 21% of the estimated statewide population of 950,000 deer. WS deer take accounted for only .04% of the total deer harvest in 1999 (Table 1). The WS impact on the deer population in the Commonwealth of Virginia is therefore considered to be of extremely low magnitude. The VDGIF has concurred that WS deer damage management activities would not adversely impact deer populations in the Commonwealth of Virginia, and that the deer population impacts covered by the EA would all be at a local level (W.M. Knox, VDGIF, letter to M. Lowney, WS, September 14, 2000).

The largest number of deer removed by Virginia WS to resolve damage problems in any year was 88 deer in FY99 (Table 1). However, the public involvement process for this EA has resulted in an increased public awareness of Virginia WS damage management assistance. As a result, there is a potential for increased requests for assistance with deer damage problems. It is unlikely that WS would remove 1,000 deer annually in Virginia; however, this number was chosen for the analysis to demonstrate the low impact to the deer population in Virginia (Table 2).

Table 2. Deer Population Estimate and Analysis of Take in Virginia

Population Estimate	950,000
Maximum WS Kill	1,000
Private Take (1998-1999 VDGIF data)	195,130
Total Kill	196,130
WS Kill: % of Population	0.11%
Total Kill: % of Population	21%

Public Involvement

Issues related to the proposed action were initially developed by WS and VDGIF. The issues were refined and preliminary alternatives were identified. Due to interest in the Virginia WS

Program the Multi-agency Team concurred that Virginia WS include public involvement in this EA process. An invitation for public comment letter on the pre-decisional EA was sent to 323 individuals or organizations identified as interested in Virginia WS or VDGIF projects. Notice of the proposed action and invitation for public involvement was placed in four newspapers (Richmond Times-Dispatch, The Virginia Pilot, The Roanoke Times, and The Washington Times) with circulation throughout Virginia. There was a 40-day comment period for the public to provide input on the pre-decisional EA. A total of four comment letters were received from the public after review of the pre-decisional EA. All comments were analyzed to identify substantial new issues, alternatives, or to redirect the program. All letters and responses are maintained in the administrative file located at the Virginia WS State Office, P.O. Box 130, Moseley, Virginia 23120.

WS received four comment letters from the public involvement process and review of the pre-decisional EA. NEPA requires that proper consideration be given to all reasonable points of view, particularly as they may relate to the issues being considered. In this light, it is important to consider and address concerns or criticisms that may arise. The following concerns were raised by commentors:

1) *Deer damage management should be fee-based, rather than tax-payer funded.* This concern is addressed in section 2.4.1 of the pre-decisional EA. Funding for WS comes from a variety of sources in addition to federal appropriations. State, county, city, private, and other federal funds are collected through cooperative agreements as reimbursement for services by Wildlife Services. Federal, State, and local officials have decided that wildlife damage management should be conducted by appropriating funds. WS was established by Congress as the agency responsible for providing wildlife damage management to the people of the United States. Wildlife damage management is an appropriate sphere of activity for government programs, since aspects of wildlife damage management are a government responsibility and authorized and directed by law.

2) *Non-lethal control methods are downplayed by the EA.* An EA is supposed to focus on impacts that may be significant or controversial. Accordingly, the EA devoted more attention to discussion of lethal methods. WS recognizes that non-lethal methods are an important component of any program using an IWDM approach. Under the proposed action, WS would continue to provide an IWDM approach in resolving white-tailed deer conflicts in VA. This IWDM approach would involve the use of non-lethal technical assistance, including information and demonstrations on exclusions devices, harassment, and animal behavior modification to reduce deer damage. Some of these non-lethal methods of deer damage management are discussed in section 3.4 of the pre-decisional EA. Ultimately, it would be the property owner's responsibility to implement the non-lethal methods recommended by WS. However, if requested and appropriate, WS would assist with implementation of one aspect of an integrated deer management plan, the lethal removal of deer as directed by permits from the VDGIF.

3) *WS should invest in an educational program to expand the public Cultural Carrying Capacity (CCC) for deer.* Education, which is included in the technical assistance provided under the proposed action, is an important element of WS's program activities because wildlife damage management is about finding "balance" or co-existence between the needs of people and needs of wildlife. This is extremely challenging as nature has no balance, but rather, is in continual flux. In addition to the routine dissemination of recommendations and information to individuals or organizations sustaining damage, lectures and demonstrations are provided to farmers, homeowners, and other interested groups. WS frequently cooperates with other agencies in education and public information efforts. Additionally, technical papers are presented at professional meetings and conferences so that WS personnel, other wildlife professionals, and the public are updated on recent developments in damage management technology, laws and regulations, and agency policies.

CCC is discussed in section 1.3.1 of the pre-decisional EA. WS provides technical assistance and educates the public about deer biology and behavior and methods to reduce deer damage, but the CCC is determined by individual property owners or communities.

4) *WS could offer partial subsidies to property owners who implement deer exclusion methods.* Wildlife

damage management is accomplished through 1) damage prevention, 2) minimizing damage, and 3) stopping existing damage. In addressing wildlife damage problems, WS seeks to find acceptable balances between human interests and wildlife needs. WS personnel recommend the use of nonlethal methods whenever they would be effective and practical. WS program services are available upon request to all U.S. citizens and institutions. However, WS direct control efforts are largely directed toward cooperator funded activities. Cooperative funding is a critical component impacting program availability and delivery. Currently the VA WS program does not have the federal or cooperative funding necessary to directly implement or subsidize non-lethal control methods such as deer exclusion. Also, no cooperative funding has been provided by another source for WS to cost-share or subsidize non-lethal methods. Funding is available for technical assistance and this service is available at no direct cost to anyone that requests such assistance from WS. This technical assistance may include information or publications about deer exclusion methods.

5) *The promotion of hunting programs by VDGIF and WS biases deer management towards a minority of taxpayers (i.e. hunters) and this is inappropriate for a government agency which should represent all citizens.* This comment directly referred to the VDGIF's Deer Control Assistance Program (DCAP), which is a site-specific deer damage management program that allows landowners a more liberal harvest of antlerless deer than allowed under current hunting regulations. The objectives of the DCAP program are to assist landowners in the control of deer damage to crops and other property while maximizing hunter participation and shifting the closed-season Kill Permit deer harvest(s) into the open deer hunting season (VDGIF). The DCAP program is administered by VDGIF, which is the agency specifically charged with the management of the state's wildlife species and with the authority to regulate hunting seasons in Virginia.

WS is the Federal agency directed by law and authorized to protect American resources from damage associated with wildlife (Animal Damage Control Act of March 2, 1931, as amended 46 Stat. 1486; 7 USC. 426-426c and the Rural Development, Agriculture, and Related Agencies Appropriations Act of 1988, Public law 100-102, Dec. 27, 1987. Stat. 1329-1331 (7 USC 426C). Therefore, the recommendation or implementation of wildlife damage management methods by WS professionals are appropriate activities for a government agency. WS utilizes or recommends the most appropriate wildlife damage management methods to reduce damage in each situation, without bias to certain groups or individuals.

The VDGIF and WS recognize that the use of legal deer hunting is probably one of the most effective and cost-effficient ways to manage deer populations (Craven and Hygnstrom 1994, VDGIF 1999, Coffey and Johnston 1997). Although public recreational hunting has limited application in some urban/suburban areas or on limited access properties, it can be a very effective and efficient method for reducing deer populations and deer damage in many situations.

Major Issues

The EA describes the alternatives considered and evaluated using the identified issues. The following issues were identified as important to the scope of the analysis (40 CFR 1508.25).

- Effects on deer populations
- Effects on non-target species, including T&E species
- Effects on human health and safety
- Humaneness of methods to be used
- Impacts to stakeholders, including aesthetics
- Effects on urban landscaping and natural resources

Affected Environment

The areas of the proposed action include farms and areas where deer are causing damage to agriculture through feeding and antler rubbing, and public and private properties in urban/suburban areas where deer cause damage to landscaping

and natural resources, damage to property during deer-vehicle collisions, and are a threat to human safety through deer-vehicle collisions and the spread of disease. The area of the proposed action would also include airports and military airbases where deer are a threat to human safety and to property.

Alternatives That Were Fully Evaluated

The following Alternatives were developed to respond to the issues above. Seven additional alternatives were considered but not analyzed in detail. A detailed discussion of the effects of the Alternatives on the issues is described in the EA; below is a summary of the Alternatives.

- **Alternative 1 - Continue the Current Deer Damage Management Program (No Action/ Proposed Action).** Under this alternative, WS would lethally remove deer by shooting or by live-capture and euthanasia to reduce damage to agricultural and natural resources, property, and human health and safety. WS recommends and utilizes an Integrated Wildlife Damage Management (IWDM) approach to manage wildlife conflicts (USDA 1997). In this case, WS would assist with the implementation of one aspect of an IWDM plan, the lethal removal of deer. Implementation of non-lethal methods recommended by WS as part of an IWDM approach would be the responsibility of the property owner or manager. WS would also continue to provide technical assistance regarding the use of non-lethal and lethal methods of deer damage management. Technical assistance may include instructional sessions, information about exclusion devices, harassment, and lethal damage management methods (e.g. hunting or Kill Permits). WS damage management services would be conducted as authorized by various federal and state regulations and would be fully funded by service recipients.

- **Alternative 2 - No WS Lethal Deer Damage Management in Virginia.** This alternative would result in no lethal assistance from WS in reducing deer damage in Virginia. WS would continue to provide technical assistance.

  All requests for lethal deer damage management assistance would not be responded to by WS and would be referred to the VDGIF or private businesses or organizations. Assistance may or may not be available from these entities. Lethal deer damage management methods could be implemented by resource owners, private businesses, volunteers, or local government employees.

Alternatives Considered but not Analyzed in Detail are the Following:

Population stabilization through birth control. Deer would be sterilized or contraceptives administered to limit the ability of deer to produce offspring. Contraceptive measures for deer can be grouped into four categories: surgical sterilization, oral contraception, hormone implantation, and immunocontraception (the use of contraceptive vaccines). These techniques would require that deer receive either single, multiple, or possibly daily treatment to successfully prevent conception. The use of this method would be subject to approval by Federal and State Agencies. This alternative was not considered in detail because: (1) it would take a number of years of implementation before the deer population would decline and therefore, damage would continue at the present unacceptable levels for a number of years; (2) surgical sterilization would have to be conducted by licensed veterinarians and would therefore be extremely expensive, (3) it is difficult, time-consuming, and expensive to effectively live trap, chemically capture, or remotely treat the number of deer necessary to effect an eventual decline in the population; (4) no chemical or biological agents for contracepting deer have been approved for use by State and Federal regulatory authorities.

Eradication and Suppression. An eradication and suppression alternative would direct all Virginia WS deer damage management efforts toward planned, total elimination or suppression of deer.

Eradication of deer in Virginia is not supported by Virginia WS or VDGIF. By VDGIF policy, the VDGIF is directed, *to maintain optimum populations of all species to serve the needs of the Commonwealth."* Other statutory policies are to preserve the State's natural resources and wildlife, and to protect wetlands (VCA §§3.1-1020, §§10.1-209, §§10.1-1188, §§10.1-1193, §§10.1-1198) (Defenders of Wildlife and the Center for Wildlife Law 1996). This alternative will not be

considered by Virginia WS in detail because:

- Virginia WS opposes eradication of any native wildlife species,
- VDGIF opposes eradication of any native Virginia wildlife species,
- The eradication of a native species would be extremely difficult if not impossible to accomplish, and cost prohibitive, and
- Eradication of native species is not acceptable to most members of the public.

Live-capture and relocation. Under this alternative WS would capture deer alive using cage-type live traps or capture drugs administered by dart gun and then relocate the captured deer to another area. Numerous studies have shown that live-capture and relocation of deer is relatively expensive, time-consuming, and inefficient (Ishmael and Rongstad 1984, O'Bryan and McCullough 1985, Diehl 1988, Jones and Witham 1990, Ishmael et al. 1995). Population reduction achieved through capture and relocation is labor intensive and would be costly ($273-$2,876/deer) (O'Bryan and McCullough 1985, Bryant and Ishmael 1991). Additionally, relocation frequently results in high mortality rates for relocated deer (Cromwell et. al. 1999, O'Bryan and McCullough 1985, Jones and Witham 1990, Ishmael et al. 1995). Deer frequently experience physiological trauma during capture and transportation and deer mortality after relocation has ranged from 25-89% (Jones and Witham 1990, Mayer et al. 1993). O'Bryan and McCullough (1985) found that only 15% of radio-collared black-tailed deer that were live-captured and relocated from Angel Island, California, survived for 1 year after relocation. Although relocated deer usually do not return to their location of capture, some do settle in familiar suburban habitats and create nuisance problems for those communities (Bryant and Ishmael 1991). High mortality rates of relocated deer, combined with the manner in which many of these animals die, make it difficult to justify relocation as a humane alternative to lethal removal methods (Bryant and Ishmael 1991). Chemical capture methods require specialized training and skill. A primary limitation of darting is the limited range at which deer can be effectively hit which is generally less than 40 yards. With modern scoped rifles, however, a skilled sharpshooter can hit the head or neck of a deer for a quick kill out to 200 yards and beyond. Thus, chemical capture is far less efficient, more labor intensive, and much more costly than removal with rifles.

Additionally, the American Veterinary Medical Association, the National Association of State Public Health Veterinarians, and the Council of State and Territorial Epidemiologists oppose relocation of mammals because of the risk of disease transmission (USDA 1997).

Use of Regulated Hunting as a Deer Management Tool. Sport hunting by private individuals regulated by wildlife management agencies can be an effective deer population management tool and can be one of the most efficient and least expensive techniques for removing deer in some situations (NH G&F 1988). However, regulated hunting with firearms is often not allowed in urban or suburban areas because of safety concerns and local ordinances. In agricultural areas, regulated hunting may not reduce the deer population sufficiently to reduce damage or the regulated hunting season may not coincide with seasonal deer damage to agricultural resources. Additionally, airports and airbases are often not accessible to the public for hunting. Lethal deer removal by WS, under the Proposed Action, would not prevent regulated deer hunting, but would be used as an additional method of reducing deer numbers in areas where hunting is legal and practical or in areas where hunting is impractical.

Use of Archery Hunting as a Deer Management Tool. In urban and suburban areas where traditional hunting with firearms is not applicable because of public safety concerns, state hunting laws, and local ordinances restricting the use of firearms, archery hunting may provide an alternative method for reducing deer populations (Kilpatrick and Walter 1999). Archery hunting may be used as an effective management tool to reduce urban deer populations (Kilpatrick and Walter 1999). However, it may be difficult to remove a sufficient number of deer using archery hunting alone. Ver Steeg et al. (1995) found that a controlled archery hunt did not sufficiently reduce the deer population in a suburban park in Illinois. Although some deer were removed by archery hunters, sharpshooting was used after the archery hunts were completed to ensure that the annual deer herd reduction goals were reached. Sharpshooting was nearly twice as efficient as archery hunting, with an overall removal rate of 3.76 deer per day for sharpshooting and 1.95 deer per day for archery hunting (Ver Steeg et al. 1995).

In Northern Virginia, a nonprofit organization called Suburban Whitetail Management sends volunteer archery hunters to suburban residents' properties to reduce deer numbers (Tolme 1999). The property owners obtain a Kill Permits from the VDGIF to allow them to remove deer and Suburban Whitetail Management provides skilled archers to harvest deer. Alternatively, the residents can remove deer from their properties themselves under the Kill Permit, but most lack the skill, equipment, or willingness to do so. While bowhunting under Kill Permits on specific properties may alleviate damage for some homeowners, it provides little relief for more large-scale damage problems. Additionally, some people may view archery hunting as less humane than sharpshooting, because deer may not be killed as quickly as they would by a bullet in the head or neck.

The Proposed Action, lethal removal of deer by WS, would not preclude the use of archery hunting as a method of deer population reduction in urban or suburban areas. Communities could choose which approach would be best for their situation, or could use a combination of both archery hunting and deer removal by WS.

Supplemental Feeding. Supplemental feeding would involve providing acceptable deer foods (e.g. corn or a balanced ration diet) either during certain annual periods when deer browsing on ornamental plants and flowers is most severe, or on a year-round basis. This alternative was not considered in detail because deer numbers would most likely continue to grow, perhaps to a level even higher than what would occur without such feeding, requiring increased costs for supplemental feed and increasing the occurrence of damage to property, agricultural and natural resources, and threats to human health and safety. Additionally, supplemental feeding may result in the spread of disease among wild deer populations. The congregation of deer and contact between deer at feeding sites may increase the transmission of diseases such as tuberculosis (Anonymous 1997).

Technical Assistance Only: WS personnel provide technical assistance such as information, instructional sessions, demonstrations and advice on available deer damage management techniques. Technical assistance includes demonstrations on the proper use of management devices (pyrotechnics, exclusion devices, etc.), wildlife habits and biology, habitat management, exclusion, and animal behavior modification. Technical assistance is generally provided following an on-site visit or verbal consultation with the requester. Bulletins and leaflets may be sent to citizens to inform them about types of deer damage and damage management methods. Generally, several management strategies are described to the requester for short and long-term solutions to damage problems; these strategies are based on factors such as need and practical application. Technical assistance may require substantial effort by WS personnel in the decision-making process, but the actual work is the responsibility of the requester. Technical assistance only was not addressed as an alternative because under APHIS NEPA Implementing Procedures (§ 372.5(c)) technical assistance is categorically excluded and does not require analysis and public scrutiny under EIS or EA procedures.

Finding of No Significant Impact

The analysis in the EA indicates that there will not be a significant impact, individually or cumulatively, on the quality of the human environment as a result of this proposed action. I agree with this conclusion and therefore find that an EIS need not be prepared. This determination is based on the following factors:

1. Deer damage management, as conducted by WS in Virginia, is not regional or national in scope.

2. The proposed action would pose minimal risk to public health and safety.

3. There are no unique characteristics such as park lands, prime farm lands, wetlands, wild and scenic areas, or ecologically critical areas that would be significantly affected.

4. The effects on the quality of the human environment are not highly controversial. Although there is some opposition to wildlife damage management, this action is not highly controversial in terms of size, nature, or effect.

5. Based on the analysis documented in the EA and the accompanying administrative file, the effects of the

proposed damage management program on the human environment would not be significant. The effects of the proposed activities are not highly uncertain and do not involve unique or unknown risks.

6. The proposed action would not establish a precedent for any future action with significant effects.

7. No significant cumulative effects were identified through this assessment. The number of deer taken by WS, when added to the total known other take of both species, falls well within allowable harvest levels.

8. The proposed activities would not affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, nor would they likely cause any loss or destruction of significant scientific, cultural, or historical resources.

9. WS determined that the proposed action would not adversely affect Federally or Virginia State listed threatened or endangered species.

10. The proposed action would be in compliance with all federal, state, and local laws imposed for the protection of the environment.

Decision and Rationale

I have carefully reviewed the EA and the input from the public involvement process. I believe that the issues identified in the EA are best addressed by selecting Alternative 1 (Continue the Current Deer Damage Management Program - No Action/Proposed Alternative in the EA) and applying the associated mitigation and monitoring measures discussed in Chapter 3 of the EA. Alternative 1 would provide the greatest effectiveness and selectivity of methods available, the best cost-effectiveness, and has the potential to even further reduce the current low level of risk to the public, pets, and T&E species. WS will continue to use currently authorized wildlife damage management methods in compliance with all the applicable mitigation measures listed in Chapter 3 of the EA. I have also adopted the Pre-Decisional EA *"Deer Damage Management in the Commonwealth of Virginia"* with the Decision Appendix A (Supplement) as the final EA. The comments identified from public involvement were minor and did not change the analysis.

For additional information regarding this decision, please contact Martin Lowney, APHIS-WS, P. O. Box 130, Moseley, Virginia 23120, telephone (804) 739-7739.

Gary E. Larson, Regional Director
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3/8/2001
Date

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